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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

|   |   |                                    |
|---|---|------------------------------------|
| NEETA THAKUR, <i>et al.</i> ,                   | ) | Case No. 25-cv-4737-RFL            |
| Plaintiffs,                                     | ) |                                    |
|   | ) | DEFENDANTS' UNOPPOSED REQUEST TO   |
| v.  | ) | HOLD THE AUGUST 26 HEARING ON ZOOM |
|   | ) |                                    |
| DONALD J. TRUMP, in his official capacity as    | ) | Judge: Hon. Rita F. Lin            |
| President of the United States, <i>et al.</i> , | ) | Hearing Date: August 26, 2025      |
|   | ) | Time: 10:00 AM                     |
| Defendants.                                     | ) | Judge: Hon. Rita F. Lin            |
|   | ) | Place: San Francisco Courthouse    |
|   | ) | Courtroom 15                       |

1 Defendants respectfully request that the Court move the August 26 hearing to be held over Zoom  
2 if the Court permits supplemental briefing to add NIH as a defendant. Undersigned understands that the  
3 Court's standing order requires requests for a hearing to be moved to Zoom to be filed one week in advance  
4 of the hearing date. Undersigned failed to file a request within that timeline. However, at that time,  
5 undersigned was unaware that supplemental briefing was a possibility. If unexpected supplemental  
6 briefing is ordered, then good cause supports this request. Plaintiffs do not oppose this request.

7 On August 20, 2025, the Court filed a notice stating its question for the hearing. ECF No. 100.  
8 That same evening, Plaintiffs informed Defendants they planned to seek leave of Court to add a named  
9 plaintiff for NIH.

10 In order to travel to the hearing, undersigned counsel will need to fly to San Francisco, which is a  
11 6-hour nonstop flight from Washington D.C. Undersigned counsel has a scheduled flight the evening of  
12 Sunday, August 24, and a return flight on the afternoon of Tuesday, August 26. Undersigned has chosen  
13 to travel on Sunday in order to mitigate airline-related delays or cancellations and to ensure that he is  
14 available on Monday in the event of any pre-hearing developments or additional questions from the Court.

15 Travel to and from San Francisco results in a substantial loss of work-related time. Federal  
16 Programs Branch laptops are configured in such a way where they cannot be used during a flight as they  
17 must always be connected to the internet and cannot access the internet when a browser-based login screen  
18 is required. All commercial airlines that undersigned is familiar with have such a browser-based login  
19 screen, including the flights undersigned will be taking.

20 Undersigned also has a substantial current workload. First, undersigned must move for summary  
21 judgment, and file an opposition in a second matter, both of which are due on September 8. In one,  
22 undersigned is opposing a summary judgment motion on an expedited schedule. In the second,  
23 undersigned must move for summary judgment. Undersigned plans to seek a two-week extension for the  
24 latter motion. Additionally, undersigned is working with the five agency defendants in this matter to  
25 finalize their administrative records by September 2. And finally, undersigned must prepare and file two  
26 joint status reports due at the end of this month.

27 Co-counsel Kathryn Barragan also has substantial commitments that prevent her from travelling  
28 DEFS.' REQUEST TO HOLD AUGUST 26 HEARING ON ZOOM  
CASE NO. 25-CV-4737

1 in undersigned's place. First, she is finalizing preparations for her wedding, which is on August 31, 2025.  
2 Second, she has three answers due by September 15 and an administrative record to prepare a different  
3 matter, expected to be filed in mid-September. Finally, she is also assisting the five agency defendants to  
4 prepare their administrative records.

5 Thus, if the Court grants Plaintiffs' request for supplemental briefing, undersigned respectfully  
6 requests that the Court set the hearing for Zoom. Plaintiffs do not oppose this request.

7  
8 DATED: August 21, 2025

Respectfully submitted,

9  
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Civil Division

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Deputy Assistant Attorney General

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14 JOSEPH E. BORSON  
Assistant Branch Director

15  
16 /s/ Jason Altabet

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